

MJO/EPA Federal State Technical Workgroup Collaborative  
Conference Call  
August 2, 2017

Attendees:

WESTAR (Mary Uhl, Tom Moore)  
CENSARA (Theresa Pella, Stephanie-TX)  
SESARM (John Hornback, Sean Altieri-KY, Jim Boylan-GA)  
LADCO (Rob Kaleel, Mark Janssen, Alex Cohan)  
MARAMA (Julie McDill)  
EPA OAQPS, OAP, OTC and Regions 1,2,3,4,5,6,8,9

EPA announced a reversal of their earlier decision not to remodel and announced that they will remodel 2011 and 2023 and will incorporate some of the NODA comments received, including inventory and model formulation comments. They expect the results to be used to address 2008 and 2015 NAAQS, including FIPS that EPA has been required to prepare under court-ordered deadline in June 2018. The inventories will be revised to project 2023 without the Clean Power Plan. As the CSAPR update rule only is a partial remedy, EPA expects to prepare a plan for a full remedy and subsequent modeling {insert date?}.

**Schedule:** The schedule is dictated by a court-ordered FIP schedule. All work must be complete in June 2018. Here is the schedule they laid out:

- Aug 2017 - EPA performs 2011 and 2023 emissions modeling with revisions mainly to EGU and oil and gas emissions
- September 2017 – EPA completes modeling
- October 2017 – EPA releases results
- Sometime in Fall 2017 or early 2018– Additional revision of 2023 modeling based on comments received that could not be incorporated into earlier fall modeling. This modeling and the schedule for this modeling may be dictated by additional FIPs.

A follow up call in late August will be scheduled by EPA to relay this information directly to states.

The 2023 modeling will be helpful to states for both 2008 and 2015 NAAQS. For states who fall out of the contribution in the revised modeling, the modeling demonstration is adequate for their SIP submittal. They will have no further obligation.

**Questions and Answers:**

**Why was 2023 picked?** NODA comments requested a remodel of 2023 and it is more efficient to stick with 2023.

**Will 2011 be unchanged?** No. EPA got comments on 2011 inventory, so minor changes may occur. EPA will let everyone know what those changes are.

**How will the LADCO work on the NODA comments be incorporated?** Submit them ASAP. New input by early sept will be too late.

**Will there be subsequent revisions to the 2023 modeling?** The next modeling that EPA will complete will be control modeling if a FIP or state needs a remedy. There is no schedule for the remedy modeling, but it is likely to be completed mid to late-fall 2017.

**Will there be a modeling protocol?** There will be a TSD and model evaluation documentation.

**What about EGU future year emissions?** Modeling will not include the effect of Clean Power Plan in this round of runs. Plan to incorporate information from the RPO/EPA information exchange that has been ongoing for the past year. Opportunities for more interaction as the modeling progresses.

**Can this fall's modeling be utilized for 2015 NAAQS transport SIPs due in October 2018?** Yes, if state doesn't contribute significantly. If a state contributes significantly, additional modeling may be needed.

**Will source apportionment results be available for 2023 or 2011 modeling? Will it show contribution by sector or state?** Source apportionment results will be available for 2023 by state.

**What about non-EGU point controls, particularly what about CT and PA RACT?** Chet: Do not plan to publish assessment in Janet's 2016 declaration. Objective to ask for additional information like installation time for controls. EPA will include an estimate of CT and PA RACT with 2023 inventory. R2 stated that CT RACT was published in fed register earlier this week.

**Can the deadline for 2015 infrastructure SIP be delayed? Is EPA looking at this?** There do not appear to be provisions for delay of infrastructure SIP deadlines.

**Can EPA send out a FIP clock list?** No comprehensive list exists, but EPA will try to put something together.